REMARKS

Claims 23-31, 33-45, 47-91 and 93-100 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the amendments and remarks.

Claims 23-31, 33-45, 47-91 and 93-100 have been rejected under 35 U.S.C. 103 as being unpatenable over U.S. Patent No. 6,269,336 to <u>Ladd</u> in view of the article by <u>Li</u>, et al., "Multimedia Content Description in the InfoPyramid". The Examiner stated essentially that the combined teachings of <u>Ladd</u> and <u>Li</u> teach or suggest all of the limitations of Claims 23-31, 33-45, 47-91 and 93-100.

Applicants respectfully submit that at the very least, Claims 23, 39 and 80 are patentable and non-obvious over the combination of <u>Ladd</u> and <u>Li</u>.

Multiple cited prior art references must suggest the desirability of being combined, and the references must be viewed without the benefit of hindsight afforded by the disclosure. The Examiner has chosen a multitude of references, apparently in hindsight, to reject Claims 23-31, 33-45, 47-91 and 93-100, however, each reference relates to an entirely different art, for example, <u>Ladd</u> teaches a markup language to provide interactive services (see Abstract) and <u>Li</u> relates to a search engine for browsing different media types (see FIGS. 1 and 2). Given the different fields of the references, e.g., markup language (<u>Ladd</u>) and search engines (<u>Li</u>), and the lack of a suggestion or motivation to combine the references, these references are not believed to be combinable. Indeed, while the Response to Arguments found in the Final Office Action attempts to support that combination of <u>Ladd</u> and <u>Li</u>, stating that "Li teaches that information

(multimedia information) written in a markup language (XML) are disclosed in a plurality of modalities...", Applicants have not found such a teaching in <u>Li</u>. In reviewing <u>Li</u> it appears that, at most, <u>Li</u> teaches that the InfoPyramid itself may be represented in XML (see page 3792, section 5.4). Clearly this is quite different from the data of the different media types represented in XML. Thus, Applicants believe that <u>Ladd</u> and <u>Li</u> are not combinable.

Assuming arguendo that <u>Ladd</u> and <u>Li</u> can be combined, Applicants turn now to the merits of the combined teachings of <u>Ladd</u> and <u>Li</u>:

Applicants submit that at the very least, Claims 23, 39 and 80 are patentable and non-obvious over the combination of <u>Ladd</u> and <u>Li</u> on the grounds that <u>Ladd</u> does <u>not</u> disclose or suggest a conversational browser or method for processing a CML document and rendering its conversational dialog in one or more of a plurality of user interface modalities, as essentially claimed in Claims 23, 39 and 80.

More particularly, referring to <u>Ladd</u>; <u>Ladd</u> teaches teaches a markup language to provide interactive services (see Abstract). <u>Ladd</u> does not teach or suggest "a CML (conversational markup language) application using CML, wherein the CML comprises meta-information implementing a conversational dialog to enable interaction with the user in a plurality of user interface modalities including a GUI (graphic user interface) modality and a speech modality; and a CML processor for parsing and interpreting the meta-information to render the conversational dialog in one or more of the plurality of user interface modalities" as claimed in Claim 23. With regard to claim 39, <u>Ladd</u> does not teach or suggest, for example, "a content server comprising one of content pages, applications, and a combination thereof, wherein the content pages and applications are implemented using a conversational markup language (CML) to describe a

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conversational dialog for interaction with a user in a plurality of user interface modalities including a GUI (graphic user interface) modality and speech modality; a conversational browser for processing one of a CML page and CML application received from the content server to render its conversational dialog in one or more of the plurality of user interface modalities." Moreover, with regard to Claim 80, <u>Ladd</u> does not teach or suggest, for example, "generating a request based on the processed input command to access a CML (conversational markup language) file from a content server, the CML file comprising meta-information to implement a conversational dialog in a plurality of user interface modalities including a GUI (graphic user interface) modality and speech modality."

Li fails to cures the deficiencies of <u>Ladd</u> in this regard. <u>Li</u> discloses nothing more than a content description language for multimedia that improves searching, indexing and managing multimedia contents, where InfoPyramid facilitates search, retrieval, manipulation and transmistion of mutlmitdiat data by providing a hierarchy of content descriptiors in the context of MPEG. <u>Li</u> fails to teach or suggest "a CML (conversational markup language) application using CML, wherein the CML comprises meta-information implementing a conversational dialog to enable interaction with the user in a plurality of user interface modalities including a GUI (graphic user interface) modality and a speech modality" as claimed in Claim 23, "content pages and applications are implemented using a conversational markup language (CML) to describe a conversational dialog for interaction with a user in a plurality of user interface modalities including a GUI (graphic user interface) modality and speech modality" as Claimed in Claim 39 nor "generating a request based on the processed input command to access... the CML file comprising meta-information to implement a conversational dialog in a plurality of user interface modalities including a GUI (graphic user interface) modality and speech modality" as claimed in

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Claim 80. Li teaches a method for describing multimedial content for the purpose of developing standard processing for developiong and publishing content descriptions (see, Introduction). The MPEG content description, see FIG. 2, is simply not related to a process of parsing and and interpreting CML meta-information, a CML file or CML application to render a conversational dialog of such CML file/applocation in one or more of a plurality of user interface modalities – converstional dialog rendering is different that MPEG content description.

The combined teachings of Ladd and Li teach a markup language document that may be represented in an infopyramid for describing content. The combined teachings of Ladd and Li fail to teach or suggest a process of parsing and and interpreting CML meta-information, a CML file or CML application to render a conversational dialog of such CML file/applocation in one or more of a plurality of user interface modalities, essentially as claimed.

Claims 24-31, 33-38 depend form Claim 23. Claims 40-45 and 47-79 depend from Claim 39. Cliams 81-91 and 93-100 depend from Claim 80. The dependent claims are beleived to be allowable for at least the reasons given for the respective independent claims. The Examiner's reconsideration of the rejeciton is respectfully requested.

For at least these reasons, Claims 23-31, 33-45, 47-91 and 93-100 are patentable and non-obvious over the combination of Ladd and Li. All pending dependent claims are patenable and non-obivous over said combination for at least the same reasons. The rejections should be withdrawn.

Respectfully submitted,

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